

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Aleem Muhammed,	:	
	:	
Plaintiff,	:	Civil Action No. 02-CV-2944
	:	
	:	
v.	:	
	:	
Avis Rent-A-Car Systems, Inc.,	:	
	:	
Defendant.	:	

**ORDER**

AND NOW, this            day of            , 2002, it appearing that Defendant, Avis Rent A Car System, Inc.'s, Motion for *Pro Hac Vice* Admission of Zachary D. Fasman, Esquire and Colleen Dorney, Esquire is unopposed, it is hereby ORDERED that Zachary D. Fasman, Esquire and Colleen Dorney, Esquire of the law firm of Paul, Hastings, Janofsky & Walker LLP are hereby admitted *pro hac vice* to the Bar of this Court under Local Rule of Civil Procedure 83.5.2. with associate counsel Steven K. Ludwig, Esquire and Catherine T. Barbieri, Esquire of the law firm of Fox, Rothschild, O'Brien & Frankel, LLP, representing Defendant, Avis Rent A Car System, Inc., in the above-captioned matter.

BY THE COURT:

\_\_\_\_\_  
ANITA B. BRODY, J.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Aleem Muhammed,	:	
	:	Civil Action No. 02-CV-2944
Plaintiff,	:	
	:	
v.	:	
	:	
Avis Rent-A-Car Systems, Inc.,	:	
	:	
Defendant.	:	

**DEFENDANT, AVIS RENT A CAR SYSTEM, INC.'S,  
UNOPPOSED MOTION FOR *PRO HAC VICE* ADMISSION OF  
ZACHARY D. FASMAN, ESQUIRE AND COLLEEN DORNEY,  
ESQUIRE PURSUANT TO LOCAL RULE OF CIVIL PROCEDURE 83.5.2**

Defendant, Avis Rent A Car System, Inc. (incorrectly identified as "Avis Rent-A-Car Systems, Inc.") ("Defendant"), by and through its undersigned counsel, hereby moves this Court, pursuant to Local Rule of Civil Procedure 83.5.2, for the admission pro hac vice of Zachary D. Fasman, Esquire and Colleen Dorney, Esquire of the law firm of Paul, Hastings, Janofsky & Walker LLP. In support thereof, counsel for Defendant states as follows:

1. This action is a civil litigation matter involving claims of racial and religious discrimination under Title VII of the Civil Rights Act of 1964 and the Pennsylvania Human Relations Act, and related state law claims. (See Plaintiff's Complaint).
2. On August 20, 2002, the undersigned entered her appearance on behalf of Defendant in the above-referenced matter.

3. On November 4, 2002, Colleen Dorney, Esquire of the law firm of Paul, Hastings, Janofsky & Walker LLP received a voice mail message from Michael Misher, Esquire, counsel for Plaintiff, who stated that Plaintiff would not oppose Defendant's Motion for the pro hac vice admission of Zachary D. Fasman, Esquire and Colleen Dorney, Esquire

4. The undersigned understands and will abide by the requirements of Associate Counsel pursuant to Local Rule of Civil Procedure 83.5.2.

5. Defendant hereby seeks the pro hac vice admission of Zachary D. Fasman, Esquire and Colleen Dorney, Esquire of the law firm of Paul, Hastings, Janofsky & Walker LLP.

6. As more fully set forth in the Affidavit attached hereto as Exhibit "A," Mr. Fasman has been a member in good standing of the Bar of the State of Illinois since 1972, the Bar of the District of Columbia since 1977, and the Bar of the State of New York since 2001. See Affidavit of Zachary D. Fasman, Esquire, attached hereto as Exhibit "A".

7. As set forth more fully in the Affidavit attached hereto as Exhibit "B," Ms. Dorney has been a member in good standing of the Bar of the State of California since 1997. See Affidavit of Colleen Dorney, Esquire, attached hereto as Exhibit "B."

WHEREFORE, Defendant respectfully requests this Court to enter the attached, proposed Order admitting Zachary D. Fasman, Esquire and Colleen Dorney, Esquire of the law firm of Paul, Hastings, Janofsky & Walker LLP pro hac vice.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Steven K. Ludwig', is written over a horizontal line.

Steven K. Ludwig, Esquire  
Catherine T. Barbieri, Esquire  
FOX, ROTHSCHILD, O'BRIEN & FRANKEL, LLP  
2000 Market Street, Tenth Floor  
Philadelphia, PA 19103-3291  
(215) 299-2839

Attorneys for Defendant,  
Avis Rent A Car System, Inc.

Dated: November 5, 2002

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Aleem Muhammed,	:	
	:	Civil Action No. 02-CV-2944
Plaintiff,	:	
	:	
v.	:	
	:	
Avis Rent-A-Car Systems, Inc.,	:	
	:	
Defendant.	:	

**AFFIDAVIT OF ZACHARY D. FASMAN, ESQUIRE  
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

STATE OF NEW YORK	:	
	:	ss.
COUNTY OF NEW YORK	:	

I, Zachary D. Fasman, Esquire, having been duly sworn, hereby make this affidavit in support of the foregoing motion for my admission *pro hac vice* on behalf of Defendant, Avis Rent A Car System, Inc. ("Defendant"), as follows:

1. I desire to be admitted *pro hac vice* to the United States District Court for the Eastern District of Pennsylvania, pursuant to Local Rule of Civil Procedure 83.5.2, as counsel for Defendant in the above-captioned matter.

2. I am a partner in the law firm of Paul, Hastings, Janofsky & Walker LLP, 75 E. 55<sup>th</sup> Street, New York, NY 10022-3205. I received my Juris Doctorate degree from the University of Michigan Law School and was admitted to the Bar of the State of Illinois in 1972, the Bar of the District of Columbia in 1977, and the Bar of the State of New York in 2001. I am admitted to practice before the following courts: the United States District Courts for the Southern and Eastern Districts of New York, the District of Columbia, and the Northern District of Illinois; the United States Courts of Appeal for

the Fourth, Sixth, Seventh, Ninth, and Eleventh Circuits and the District of Columbia; and the United States Supreme Court.

3. Since the dates of the admissions to the bar and courts set forth above, I have continued to practice in these courts and have at all times remained a member in good standing of the bar and these courts. I presently am not, and never have been, the subject of any disbarment or suspension proceedings before these, or any other, courts.

4. Upon my admission to this Court and pursuant to Local Rule of Civil Procedure 83.5.2, I will assist and be associated in this matter with Pennsylvania counsel of record, Steven K. Ludwig, Esquire and Catherine T. Barbieri, Esquire of Fox, Rothschild, O'Brien & Frankel, LLP, 2000 Market Street, Tenth Floor, Philadelphia, PA 19103-3291.

5. Defendant has asked me to represent it in the trial of this matter along with Steven K. Ludwig, Esquire. I have been admitted *pro hac vice* in the following courts: the United States District Courts for the Eastern District of Pennsylvania, the Eastern District of Virginia, the Southern District of Texas, the Central District of California, the Eastern District of Michigan and the Northern District of Georgia.

6. There is good cause for my special admission to the Bar of this Court.

7. I have concentrated my practice in employment litigation. My experience will be beneficial to Defendant.

8. If specifically admitted to the Bar of this Court, I will be admitted solely for the purposes of participating in this action.

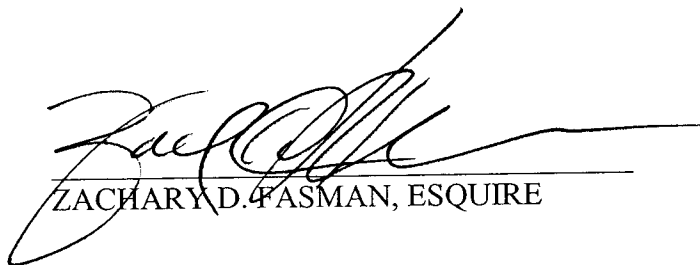
9. I am willing and able to comply with all rules of this Court relating to admission, professional conduct, and civil procedure, and hereby understand that my

application and pending admission *pro hac vice* subjects me to the disciplinary jurisdiction of this Court for any alleged misconduct that I commit in this matter.

10. Plaintiff will not be prejudiced in any way if I am admitted *pro hac vice* to the Bar of this Court as counsel for Defendant in this matter. However, Defendant would suffer prejudice if I were denied admission *pro hac vice* to the Bar of this Court.

11. No good cause exists to deny my special admission as *pro hac vice* counsel in this matter.

I have carefully read this affidavit and it is true to the best of my knowledge and belief.

  
ZACHARY D. FASMAN, ESQUIRE

Date: November 4, 2002

Sworn to and Subscribed

Before me this 4<sup>th</sup> day

of November, 2002.

  
\_\_\_\_\_  
Notary Public

ALLAN S. BLOOM  
Notary Public, State of New York  
No. 02BL5057984  
Qualified in New York County  
Commission Expires April 1, 2004

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Aleem Muhammed,	:	
	:	Civil Action No. 02-CV-2944
Plaintiff,	:	
	:	
v.	:	
	:	
Avis Rent-A-Car Systems, Inc.,	:	
	:	
Defendant.	:	

**AFFIDAVIT OF COLLEEN DORNEY, ESQUIRE  
IN SUPPORT OF MOTION FOR *PRO HAC VICE* ADMISSION**

STATE OF NEW YORK	:	
	:	ss.
COUNTY OF NEW YORK	:	

I, Colleen Dorney, Esquire, having been duly sworn, hereby make this affidavit in support of the foregoing motion for my admission *pro hac vice* on behalf of Defendant, Avis Rent A Car System, Inc. ("Defendant"), as follows:

1. I desire to be admitted *pro hac vice* to the United States District Court for the Eastern District of Pennsylvania, pursuant to Local Rule of Civil Procedure 83.5.2, as counsel for Defendant in the above-captioned matter.

2. I am an associate with the law firm of Paul, Hastings, Janofsky & Walker LLP, 75 E. 55<sup>th</sup> Street, New York, NY 10022-3205. I received my Juris Doctorate degree from the University of San Diego School of Law and was admitted to the Bar of the State of California in December 1997. I am also admitted to practice before the following courts: the United States District Court for the Central District of California and the United States District Court for the Southern District of California.



3. Since the dates of the admissions to the bar and courts set forth above, I have continued to practice in these courts and have at all times remained a member in good standing of the bar and these courts. I presently am not, and never have been, the subject of any disbarment or suspension proceedings before these, or any other, courts.

4. Upon my admission to this Court and pursuant to Local Rule of Civil Procedure 83.5.2, I will assist and be associated in this matter with Pennsylvania counsel of record, Steven K. Ludwig, Esquire and Catherine T. Barbieri, Esquire of Fox, Rothschild, O'Brien & Frankel, LLP, 2000 Market Street, Tenth Floor, Philadelphia, PA 19103-3291.

5. Defendant has asked me to represent it in the trial of this matter along with Steven K. Ludwig, Esquire. I have been admitted *pro hac vice* in the following courts: The United States District Court for the Eastern District of Pennsylvania and the Superior Court of New Jersey, Morris County and Union County.

6. There is good cause for my special admission to the Bar of this Court.

7. I have concentrated my practice in employment litigation. My experience will be beneficial to Defendant.


8. If specifically admitted to the Bar of this Court, I will be admitted solely for the purposes of participating in this action.

9. I am willing and able to comply with all rules of this Court relating to admission, professional conduct, and civil procedure, and hereby understand that my application and pending admission *pro hac vice* subjects me to the disciplinary jurisdiction of this Court for any alleged misconduct that I commit in this matter.

10. Plaintiff will not be prejudiced in any way if I am admitted *pro hac vice* to the Bar of this Court as counsel for Defendant in this matter. However, Defendant would suffer prejudice if I were denied admission *pro hac vice* to the Bar of this Court.

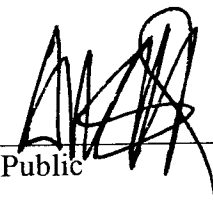
11. No good cause exists to deny my special admission as *pro hac vice* counsel in this matter.

I have carefully read this affidavit and it is true to the best of my knowledge and belief.

  
COLLEEN DORNEY, ESQUIRE

Date: November 4, 2002

Sworn to and Subscribed  
Before me this 4<sup>th</sup> day  
of November, 2002.

  
\_\_\_\_\_  
Notary Public

ALLAN S. BLOOM  
Notary Public, State of New York  
No. 02BL5057984  
Qualified in New York County  
Commission Expires April 1, 2004

**CERTIFICATE OF SERVICE**

I, Catherine T. Barbieri, Esquire, hereby certify that a true and correct copy of the foregoing Defendant, Avis Rent A Car System, Inc.'s, Unopposed Motion For *Pro Hac Vice* Admission of Zachary D. Fasman, Esquire and Colleen Dorney, Esquire pursuant to Local Rule of Civil Procedure 83.5.2. was served today, via United States first class mail, postage prepaid, upon the following:

Joseph M. Toddy, Esq.  
Zarwin, Baum, DeVito, Kaplan, O'Donnell, Schaer P.C.  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102

Attorney for Plaintiff,  
Aleem Muhammed



Catherine T. Barbieri

Date: November 5, 2002